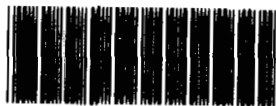


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Department of Energy

ROCKY FLATS OFFICE
P.O. BOX 928
GOLDEN, COLORADO 80402-0928

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JUN 26 1992

92-DOE-6783

ACTION
DIST. LTR ENCL

BENJAMIN, A.	
BERMAN, H.S.	
BRADY, J.A.	
BRANCH, D.B.	
CARNIVAL, G.J.	
COPP, R.D.	
CORDOVA, R.C.	
DAVIS, J.G.	
EVERED, J.E.	
FERRERA, D.W.	
GOODWIN, R.	
HANNI, B.J.	
HEALY, T.J.	
HILBIG, J.G.	
DEKER, E.H.	
KERSH, J.M.	X
KIRBY, W.A.	
KRIEG, D.	
KUESTER, A.W.	
LEE, E.M.	
MARX, G.E.	
MORGAN, R.V.	
PIZZUTO, V.M.	
POTTER, G.L.	
SANDLIN, N.B.	
SATTERWHITE, D.G.	
SCHUBERT, A.L.	X
SHEPLER, R.L.	
SULLIVAN, M.T.	
SWANSON, E.R.	
TAN, K.G.	
WILSON, J.M.	
ZANE, J.O.	

Mr. Frederick R. Dowsett, Unit Leader
Monitoring and Enforcement
Hazardous Materials and Waste Management Division
Colorado Department of Health
4210 East 11th Avenue
Denver, Colorado 80220-3716

Mr. Steve Burkett, Chief
Compliance Branch 8WM-C
Water Management Division
U.S. Environmental Protection Agency, Region VIII
999 18th Street, Suite 500
Denver, Colorado 80202-2405

Gentlemen:

Thank you for meeting with the Rocky Flats Office on May 19, 1992 regarding the regulation of precipitation runoff from pads 750 and 904 at Rocky Flats Plant (RFP). Based on the outcome of that meeting, we are instructing EG&G to initiate the following actions for managing pad runoff.

1. Complete the planned capital improvements. These improvements were discussed in the meeting and include sealing the pad surface to fix residual contamination; constructing a new tent to provide additional storage; and installing berms at tent doors and sealing tent perimeters to minimize runoff into tents.
2. Install gate valves or similar flow control devices in the down slope section of the pad berms to control runoff from the pads. The valves will normally be kept closed and runoff will be discharged only after a determination has been made that no waste has contaminated the runoff. (This requirement is also included in the procedures discussed in item 4 below.)
3. Maintain the improvements listed in item 1 based on the manufacturer's recommendation, or more frequently if significant deterioration is observed.
4. Initiate the following additional pad management procedures after capital improvements have been completed:

- triple rinse spill areas after spills are cleaned to background radiation levels by current methods,
- collect and treat all rinse water in Building 374,
- collect runoff that accumulates in tents and treat in Building 374, and
- discharge collected pad runoff manually after a determination is made by the pad manager that the runoff does not contain waste from a spill that was not cleaned.

Reviewed for Addressee
Corres. Control RFP

52992

DATE BY

Tr. #

ADMIN RECORD

A-0010-000379

JUN 26 1994

Frederick R. Dowsett
92-DOE-6783

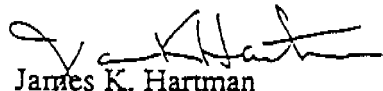
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5. Provide employee training for pad management procedures listed in item 4.
6. Sample pad runoff after the capital improvements are completed and the additional management procedures are implemented to ensure the effectiveness of the improvements. Sampling will be done prior to the initial discharge and routinely thereafter. Routine sampling of pad runoff will be conducted approximately every six months, depending upon precipitation events, until superseded by the new RFP National Pollutant Discharge Elimination System (NPDES) permit requirements.
7. In the interim (until capital improvements are completed and additional management procedures are implemented including employee training) pad runoff that can be collected will be treated.

The planned capital improvements are scheduled to be completed by September 30, 1992. A schedule for completing items 2 and 5 above will be provided to you when it is established.

If you have any questions concerning these actions please contact Tom Lukow at 966-4561.

Sincerely,


James K. Hartman
Assistant Manager
for Environmental Management

cc:

R. Shankland, EPA, Region VIII
M. Hestmark, EPA, Region VIII
T. Lukow, WMED, RFO
M. Van Der Puy, EMB, RFO
J. Dion, EMB, RFO
D. Hauser, CSD, RFO
A. Schubert, EG&G, RFP

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